

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JEEUN FRIEL, Individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

DAPPER LABS, INC. AND ROHAM  
GHAREGOZLOU,

Defendants.

Case No.: 1:21-cv-05837-VM

**NOTICE OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES,  
REIMBURSEMENT OF LITIGATION EXPENSES, AND AWARDS TO PLAINTIFFS**

PLEASE TAKE NOTICE that, pursuant to the Court's June 4, 2024, Order Preliminarily Approving Class Action Settlement and Providing for Notice, on September 27, 2024 at 10:00 a.m., before the Honorable Victor Marrero, United States District Judge of the Southern District of New York, 500 Pearl Street, Courtroom 15B, New York, NY 10007, Lead Plaintiff Gary Lewis and Named Plaintiff John Austin ("Plaintiffs") move the Court for entry of an Order awarding: (1) attorneys' fees in the amount of one-third of the \$4,000,000 Settlement Amount,<sup>1</sup> plus interest; (2) reimbursement of litigation expenses, plus interest; and (3) awards to Plaintiffs.

This motion is based on: (a) this Notice of Motion; (b) the accompanying Memorandum of Law in Support thereof; (c) the Declaration of Phillip Kim in Support of the Motions for: (I) Final Approval of Class Action Settlement and Plan of Allocation; and (II) an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, Awards to Plaintiffs (and all exhibits thereto); (d) the pleadings and papers filed herein; (e) arguments of counsel; and (f) any other matters properly before the Court.

A proposed order is submitted herewith.

DATED: August 23, 2024  
New York, New York

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Phillip Kim

Phillip Kim, Esq.

Laurence M. Rosen, Esq.

Michael Cohen, Esq.

275 Madison Avenue, 40th Floor

New York, New York 10016

Telephone: (212) 686-1060

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<sup>1</sup> Unless otherwise defined herein, all capitalized terms have the same meanings ascribed to them in the Stipulation of Settlement, filed on June 3, 2024 (Dkt. No. 67).

Fax: (212) 202-3827

Email: philkim@rosenlegal.com

Email: lrosen@rosenlegal.com

Email: mcohen@rosenlegal.com

*Counsel for Plaintiffs and the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 23, 2024, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system

/s/ Phillip Kim  
Phillip Kim